

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)
WARREN S. JONES, JR., ESQUIRE Bar #003781980 Law Offices of Warren S. Jones, Jr., LLC 1 Trinity Lane Mt. Holly New Jersey 08060 (609) 261-8400 (609) 261-5252 fax
In Re: Elizabeth Impellizzeri

Case No.: 20-16208
Judge: Christine M. Gravelle
Hearing Date:
Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO
☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**
☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following:

1. ☒ Motion for Relief from the Automatic Stay filed by **Pnc Mortgage (14)**, creditor,

A hearing has been scheduled for December 1, 2021 at **9:00** a.m.

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ a.m.

- ☐ Certification of Default filed by **Pnc Mortgage (14)**, creditor,

I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons

- ☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.
- ☐ Payments have not been made for the following reasons and debtor proposes repayment as follows: [Click or tap here to enter text.](#)
- ☒ Other: Debtor seeks to capitalize the post-petition arrearages of \$7411.09 and resume regular payments as of the 11/8/2021 payment. A modified plan is forthcoming to accommodate this, and other, changes.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: October 28, 2021

/s/ Elizabeth Impellizzeri
Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.J.N.J. LBR 9013-(d), if filed in opposition to a Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a Creditor's Certification of Default (under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions) or a Trustee's Certification of Default.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

CERTIFICATION OF SERVICE

1. I, **Warren S. Jones, Jr.**, represent the DEBTOR(S) in this matter.
2. On **Thursday, October 28, 2021**, I sent a copy of the foregoing to the parties listed in the chart below.
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: October 28, 2021

/s/ WARREN S JONES, JR.

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Elizabeth Impellizzeri 1 Cragmoor Drive Shamong, NJ 08088	Debtor(s)	<input checked="" type="checkbox"/> Regular Mail
Albert Russo 1 AAA Drive Suite 101 Robbinsville, NJ 08691	Trustee	<input checked="" type="checkbox"/> Notice of Electronic Filing (ECF)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail
Pnc Mortgage (14	Creditor Attorney	<input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)